

### **Summary of Lead and Copper Rule (LCR) Oversight Activities:**

- R2 LCR File Review Strategy (updated 5/3/16)
- Tribal File Review
- Tribal DIME data entry completion- upload to SDWIS Fed- quarterly
- NY File Review in May 2016
- NJDEP File Review- completed small system in April 2016
- 2<sup>nd</sup> File Review NYSDOH in Albany, NY in June 2016
- 2<sup>nd</sup> File review NJDEP Large systems in June or July 2016
- Quarterly data uploads and mining to identify LCR issues- R2 DWGWPS
- Monthly or quarterly conference calls or meeting with primacy states to discuss LCR PWSs with ALE and state actions plan
- Coordination within R2: DECA and CEPD
- Coordination with OGWDW to provide R2 updates

### **Identified issues in R2 with Primacy State oversight:**

- Optimal Corrosion Control plans approved by primacy state- not available for review by EPA
  - Evidence of primacy state approving them
  - WQP- in NJDEP difficult to identify original WQP- not available for EPA to review
    - Records of 1990's approvals and limits established are not available for review by EPA
    - Complex systems that wholesale or purchase from different systems with individual WQPs. Primacy state needs to address this issue consistently
- Tier 1 verification- primacy states have slipped in the process
  - Primacy state needs to collect this data and verify that they were approved sites
  - Confirm the changes of site were legitimate and approve this change
- Lead Service Line Replacement - PWS and/or States can't confirm the locations, or verify partial or whole LSLR have been replaced
  - Will require intensive resources to create or update the state's inventory
  - Verification that PWSs are completing this task will be difficult